

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

**JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI, *ex rel.* THE
STATE OF MISSISSIPPI,**

v.

JPMORGAN CHASE & CO., et al.,

PLAINTIFF

CIVIL NO.: 3:12-cv-565-WHB-LRA

DEFENDANTS

CONSOLIDATED WITH

**JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI, *ex rel.* THE
STATE OF MISSISSIPPI,**

v.

HSBC BANK NEVADA, N.A., et al.,

PLAINTIFF

CIVIL NO.: 3:12-cv-571

DEFENDANTS

CONSOLIDATED WITH

**JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI, *ex rel.* THE
STATE OF MISSISSIPPI,**

v.

CITIGROUP INC., et al.,

PLAINTIFF

CIVIL NO.: 3:12-cv-572

DEFENDANTS

CONSOLIDATED WITH

**JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI, *ex rel.* THE
STATE OF MISSISSIPPI,**

PLAINTIFF

v.

CIVIL NO.: 3:12-cv-573

**DISCOVER FINANCIAL SERVICES,
INC., et al.,**

DEFENDANTS

CONSOLIDATED WITH

**JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI, *ex rel.* THE
STATE OF MISSISSIPPI,**

PLAINTIFF

v.

CIVIL NO.: 3:12-cv-574

**BANK OF AMERICA CORPORATION, et
al.,**

DEFENDANTS

CONSOLIDATED WITH

**JIM HOOD, ATTORNEY GENERAL OF
THE STATE OF MISSISSIPPI, *ex rel.* THE
STATE OF MISSISSIPPI,**

PLAINTIFF

v.

CIVIL NO.: 3:12-cv-572

CAPITAL ONE BANK (USA) N.A., et al.,

DEFENDANTS

**DEFENDANTS' JOINT RESPONSE IN OPPOSITION
TO PLAINTIFF'S MOTION TO CERTIFY
AN INTERLOCUTORY APPEAL UNDER 28 U.S.C. § 1292(B)**

Defendants JPMorgan Chase & Co. and Chase Bank USA, N.A.; Capital One Bank (USA) N.A. and Capital One Services, LLC; Citigroup Inc., Citibank, N.A., and Department Stores National Bank; Discover Financial Services, Inc., Discover Bank, and DFS Services, LLC; Bank of America Corp. and FIA Card Services, NA; and HSBC Bank Nevada, N.A., HSBC Bank USA, N.A., and HSBC Card Services, Inc.; and American Bankers Management Company, Inc submit this Joint Response In Opposition To Plaintiff's Motion To Certify An Interlocutory Appeal Under 28 U.S.C. § 1292(b).

As further explained in the supporting memorandum of law that Defendants are filing separately under Local Rule 7(b)(2), the motion should be denied because the questions the Attorney General asks this Court to certify for interlocutory appeal (1) do not present a “controlling question of law as to which there is substantial ground for difference of opinion,” and (2) would not “materially advance the ultimate termination of the litigation.” 28 U.S.C. § 1292(b).

Defendants also submit the following Exhibits with this Joint Response:

- Exhibit 1: State of Mississippi's Petition for Permission to Appeal Order Denying Remand Pursuant to 28 U.S.C. § 1453(c)
- Exhibit 2: Defendants - Respondents' Joint Answer In Opposition to the Petition for Permission to File Appeal

DATED: August 30, 2013.

JPMORGAN CHASE & CO. and
CHASE BANK USA, N.A.

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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2013, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send a notification of such filing to the counsel of record who have entered appearances in this action.

/s/ Phillip S. Sykes
Phillip S. Sykes